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8 Attorneys for Petitioners
THE PACIFIC LUMBER COMPANY, SCOTIA PACIFIC
9 COMPANY LLC AND SALMON CREEK LLC

10 BEFORE THE
11 STATE WATER RESOURCES CONTROL BOARD
12

13 In the Matter of:

14 Adoption of Watershed-Wide Waste Discharge
Requirements (WWDRs) for Pacific Lumber
15 Company Timber Harvest Activities in the Elk
River and Freshwater Creek Watersheds,
16 Humboldt County, California (North Coast
Regional Water Quality Control Board)
17
18 THE PACIFIC LUMBER COMPANY, SCOTIA
PACIFIC COMPANY LLC and SALMON
19 CREEK CORPORATION,

20 Petitioners,

21 v.

22 NORTH COAST REGIONAL WATER
QUALITY CONTROL BOARD,
23
24 Respondent.

SWRCB/OCC File

**PETITION FOR REVIEW OF
WATERSHED-WIDE WASTE
DISCHARGE REQUIREMENTS**

(To be held in abeyance**)**

Elk River:

Resolution No. R1-2006-0038
Order No. R1-2006-0039
MRP No. R1-2006-0039

Freshwater Creek:

Resolution No. R1-2006-0040
Order No. R1-2006-0041
MRP No. R1-2006-0041

INTRODUCTION

26 The Pacific Lumber Company, Scotia Pacific Company LLC, and Salmon Creek LLC
27 (collectively "PALCO" or "Petitioners") hereby petition for review of the North Coast Regional
28

1 Water Quality Control Board's ("Regional Water Board") May 8, 2006 adoption of Watershed-
2 Wide Waste Discharge Requirements ("WWDRs") in the Elk River and Freshwater Creek
3 Watersheds.¹

4 This Petition for Review is brought pursuant to the provisions of California Water Code
5 section 13320 and Title 23 of California Code of Regulations sections 2050 and 2053.

6 PALCO is *not* currently seeking a stay of the WWDRs.

7 PALCO also requests that this petition be *held in abeyance* pending the successful
8 implementation of the WWDRs.²

9
10 **PETITION FOR REVIEW AND REQUEST FOR HEARING**

11 **I. NAME AND ADDRESS OF PETITIONERS**

12 The Pacific Lumber Company
13 Scotia Pacific Company LLC
14 Salmon Creek LLC
15 125 Main Street
16 P.O. Box 37
17 Scotia, California 95565
18 (707) 764-2222

19 **II. SPECIFIC ACTION OF THE REGIONAL WATER BOARD**

20 This Petition appeals the Regional Water Board's May 8, 2006 adoption of WWDRs in
21 the Elk River and Freshwater Creek watersheds in Humboldt County. A true and correct copy of
22 the resolutions, orders, and monitoring and reporting programs (hereinafter referred to,
23 collectively, as the "WWDRs") are enclosed as **Exhibit A** and **Exhibit B**.
24

25
26 ¹ **Exhibit A** constitutes Resolution No. R1-2006-0038, along with attachments that
27 include Order No. R1-2006-0039 and MRP No. R1-2006-0039 (collectively "Elk River
28 WWDR"). **Exhibit B** constitutes Resolution No. R1-2006-0040, along with attachments that
include Order No. R1-2006-0041 and MRP No. R1-2006-0041 (collectively "Freshwater
WWDR").

² The State Water Board's instructions for water quality petitions state: "Petitioners may
wish to file a petition within the deadline stated above, but plan to attempt to comply with the
Regional Water Board's order, or for other reasons do not seek active review of the petition. Such
petitions may be 'held in abeyance' by the State Water Board, generally for up to two years. The
petition may include a request that the petition be held in abeyance."

1 **III. DATE OF THE REGIONAL WATER BOARD ACTION**

2 The Regional Water Board's action was taken on May 8, 2006.

3 **IV. STATEMENT OF REASONS WHY THE REGIONAL WATER BOARD**
4 **ACTION WAS INAPPROPRIATE AND IMPROPER**

5 PALCO is submitting this Petition as a protective filing. It remains to be seen whether the
6 Regional Water Board's action, as a practical matter, was inappropriate and improper. Successful
7 and timely implementation of the WWDRs may end the contentious debate that has transpired
8 over PALCO's operations in the watersheds. PALCO is committed to work towards that goal,
9 but PALCO also reserves all of its rights, including its rights under the Headwaters Agreement,
10 and is proceeding with implementation of the WWDRs under protest through this filing.
11 Moreover, any operations that PALCO conducts pursuant to the WWDRs is an effort to mitigate
12 damages that PALCO has suffered and continues to suffer. Such operations are undertaken
13 without prejudice to PALCO's positions stated herein.

14 Throughout the lengthy process culminating in adoption of the WWDRs, PALCO
15 identified a number of flaws in the WWDRs proposed by Regional Water Board staff and in the
16 process for their consideration and adoption. While PALCO called these flaws to the attention of
17 the Regional Water Board, they were not remedied. Those flaws include:

- 18 • The findings in the WWDRs are not supported by the evidence in the record
19 • The WWDRs violate the prohibition in Water Code Section 13360(a) that
20 provides:

21 No waste discharge requirement or other order of a regional
22 board or the state board or decree of a court issued under this
23 division shall specify the design, location, type of construction,
24 or particular manner in which compliance may be had with that
25 requirement, order, or decree, and the person so ordered shall be
26 permitted to comply with the order in any lawful manner.

- 27 • The Regional Water Board proceedings violated PALCO's rights to due process
28 and equal protection

29 **V. MANNER IN WHICH THE PETITIONERS ARE AGGRIEVED**

30 Preparation and adoption of the WWDRs—a process that was supposed to take only a few
31 months—took approximately two years. During that time, PALCO's operations in the two

1 watersheds were either severely limited or shut down entirely. The impacts to PALCO, its
2 contractors, and the regional community have been identified and detailed in the administrative
3 record repeatedly throughout this process. PALCO is hopeful that the controversial nature of
4 these proceedings is over, and that the adoption of the WWDRs will prove to be a turning point
5 that results in stable timber operations. However, the debilitating impacts to PALCO and its
6 dependent community will continue, and may be exacerbated, if the WWDRs are not successfully
7 implemented (including in a timely fashion). PALCO reserves the right to supplement, if
8 necessary, the manner in which it is aggrieved as implementation of the WWDRs progresses.

9 **VI. SPECIFIC ACTION REQUESTED BY THE PETITIONERS**

10 At this time, PALCO respectfully requests that this petition be *held in abeyance* pending
11 the successful implementation of the WWDRs. If implementation proves problematic, PALCO
12 reserves the right to further request any and all actions authorized in Water Code Section 13320.

13 Also, PALCO is *not* requesting a stay of the WWDRs at this time, but reserves the right to
14 do so if the necessity arises.

15 **VII. STATEMENT OF POINTS AND AUTHORITIES IN SUPPORT OF** 16 **PETITION**

- 17 • *The Findings in the WWDRs Are Not Supported by the Evidence in the Record*

18 The Resolutions for the WWDRs state on the first page that “[i]n making findings, the
19 Regional Water Board provides an analytical roadmap of its decision” and cite the California
20 Supreme Court’s decision in Topanga Association for a Scenic Community v. County of Los
21 Angeles, 11 Cal. 3d 506 (1974). Unfortunately, the adopted findings run afoul of Topanga by
22 ignoring the fundamental requirement that the evidence must support the findings. *Id.* at 510.
23 Instead, the Regional Water Board adopted findings prepared by its staff that are not accurate and
24 do not correctly discuss the evidence in the record, instead depending on unsupportable
25 statements. In a recent court decision involving PALCO’s operations in these same watersheds,
26 the court admonished the State Water Board for improperly setting aside the enrollment of
27 PALCO’s THPs under General Waste Discharge Requirements:

28 To be sure, the uniform agency procedure of having staff prepare
recommendations and proposed orders for a board is a good one,

1 and serves an important due process function. However, a final
2 Order should not only reflect the actual findings and analytical path
3 of the Board members required by [the Topanga decision], but also
4 phrasing that accurately speaks on behalf of the Board.

5 Ruling on Petition for Writ of Mandate, Pacific Lumber Co. v. State Water Res. Control Bd., No.
6 CV050516 (Humboldt County Superior Court, Apr. 27, 2006) at 15. PALCO is concerned that in
7 light of the monumental task that was facing the Regional Water Board, it was not able to assure
8 itself that the statements in the lengthy resolutions (each containing over 100 findings) reflected
9 the *actual* findings and analytical path of the *Board members*. At any rate, the findings are not
10 supported by the record.

11 • *The WWDRs Violate the Prohibition in Water Code Section 13360(a)*

12 California's water quality law—the Porter-Cologne Water Quality Control Act—provides
13 for the control of discharges of waste into waters of the state through the adoption of waste
14 discharge requirements (“WDRs”). Water Code section 13263 authorizes the Regional Water
15 Board to adopt WDRs. Subsection (a) provides that “[t]he regional board, after any necessary
16 hearing, shall prescribe requirements as to the nature of any proposed discharge, existing
17 discharge, or material change in an existing discharge, except discharges into a community sewer
18 system, with relation to the conditions existing in the disposal area or receiving waters upon, or
19 into which, the discharge is made or proposed.” Cal. Water Code § 13263(a). However, the
20 Water Code contains an express limitation on what a WDR may specify:

21 No waste discharge requirement ... shall specify the design,
22 location, type of construction, or particular manner in which
23 compliance may be had with that requirement ... and the person so
24 ordered shall be permitted to comply with the order in any lawful
25 manner.

26 Id. § 13360(a). The State Water Board, as it must, has recognized the force of this limitation in a
27 variety of contexts, including regulation of the water quality impacts of timber harvesting. See In
28 the Matter of the Petitions of Cal. Forestry Ass’n & EPIC, Order No. WQO 2004-0002 at 17
(State Water Res. Control Bd., Jan. 22, 2004) (finding that water boards may specify management
practices for timber operations in waivers, but that such practices are arguably prohibited in
WDRs under section 13360) (cited in EPIC v. Cal. Regional Water Quality Control Bd.—Central

1 Valley, No. 04CS00347, Ruling on Submitted Matter at 19-20 (Sacramento Super. Ct., June 30,
2 2005)); see also 1 State Water Res. Control Bd., Nonpoint Source Program Strategy and
3 Implementation Plan, 1998-2013 (PROSIP) at 15 (“WDRs ordinarily specify the allowable
4 discharge concentration or load or the resulting condition of the receiving water, rather than the
5 manner by which those results are to be achieved.”).

6 The WWDRs run afoul of this statutory limitation. They specify the manner of
7 compliance by first establishing a clear-cut equivalent acre limit, then requiring PALCO to
8 submit its anticipated THPs within that limit, and finally prohibiting any enrollment in
9 exceedance of that limit unless the permit is formally revised. For example, the WWDR for the
10 Elk River Watershed at section IV purports to establish “Receiving Water Limitations.” The
11 section heading is a misnomer because the limitation is placed on harvesting—not on the
12 receiving waters. The WWDR establishes a harvest rate limitation for “the enrollment of a
13 maximum annual harvest in the North Fork Elk River watershed of 264 Clearcut Equivalent
14 Acres per year.” Elk River WWDR § IV(A)(1)(a). The WWDR then requires compliance with
15 the harvesting limit, without offering any alternative, by stating that “[i]n the event that the
16 Discharger’s Timber Harvesting Plan Activities in any calendar year exceed the harvest acreage
17 associated with this limitation, no additional acreage shall be enrolled for the remainder of that
18 year, and the Discharger shall be liable for exceedance of said limitation as a violation of this
19 Order.” Id. § IV(A)(1)(b). Despite the name used in the WWDR, this is not a “Receiving Water
20 Limitation”—it is a harvest limitation, and it impermissibly specifies the manner of compliance in
21 violation of Water Code section 13360(a).

22 A state court of appeal has already explained that this type of regulation is invalid. In
23 Tahoe-Sierra Preservation Council v. State Water Resources Control Board, 210 Cal. App. 3d
24 1421 (1989), the court explained:

25 Section 13360 says that the Water Board may not prescribe the
26 manner in which compliance may be achieved with a discharge
27 standard. That is to say, the Water Board may identify the disease
28 and command that it be cured but not dictate the cure. ... Section
13360 is a shield against unwarranted interference with the
ingenuity of the party subject to a waste discharge requirement; it is
not a sword precluding regulation of discharges of pollutants. It

1 preserves the freedom of persons who are subject to a discharge
2 standard to elect between available strategies to comply with that
3 standard.

4 Id. at 1438; see also In the Matter of the Petition of the United States Dep't of Agric., Forest
5 Serv., Order No. WQ 83-3 (State Water Res. Control Bd., Apr. 21, 1983) (deciding that several
6 provisions in WDRs for erosion caused by runoff violate section 13360); City of Burbank v. State
7 Water Res. Control Bd., 35 Cal. 4th 613, 623 n.6 (2005) (leaving intact the trial court ruling that
8 the WDRs violated section 13360); EPIC v. Cal. Reg'l Water Quality Control Bd.—Central
9 Valley, No. 04CS00347, Ruling on Submitted Matter at 19-20 (Sacramento Super. Ct., June 30,
10 2005) (observing that measures can be included in waivers that may not be in WDRs because of
11 the section 13360 prohibition). In the Tahoe-Sierra case, the State Water Board upheld a WDR
12 for surface runoff discharges from development. In finding the WDR lawful, the court observed
13 that the WDR allowed landowners to demonstrate compliance in any manner. Tahoe-Sierra, 210
14 Cal. App. 3d at 1440. In stark contrast, the WWDRs here provide only one manner of
15 compliance—through a rate of harvest limitation. PALCO repeatedly explained that it can
16 control runoff and resolve any alleged nuisance flooding conditions through other means.
17 Nevertheless, PALCO's only alternative is, as a practical matter, to go through the whole permit
18 process again. Elk River WWDR § IV(A)(1)(c) ("Any revision to this receiving water limitation
19 must be approved by the Regional Water Board and be subject to public review"). That is not
20 what section 13360 envisions. Unlike the WDR in the Tahoe-Sierra case, the WWDRs here are
21 not flexible—they directly regulate and impose liability for harvest beyond certain limits. By
22 refusing to allow any alternatives without a formal permit revision subject to public hearing and
23 subsequent approval by the Regional Water Board, the WWDRs violate Water Code section
24 13360.

- *The Regional Water Board Proceedings Violated PALCO's Rights to Due Process and Equal Protection*

25 Throughout the proceedings, PALCO objected to the structural unfairness posed by the
26 division of staff into an "Issuance Team" and an "Advisory Team," and particularly to the
27 impossibility of asking staff on the latter to critique the proposed WWDRs of the former and to
28 "neutrally" advise the Board as to those proposed WWDRs. It is worth noting that the State

1 Water Board was recently held to have abused its discretion and created an impermissible
2 appearance of unfairness by allowing a staff counsel to serve on an "Enforcement Team" in one
3 matter and on a "Hearing Team" in an unrelated matter. Judgment Granting Peremptory Writ of
4 Mandamus, Morongo Band of Mission Indians v. State Water Resources Control Board, No.
5 04CS00535 (Sacramento County Superior Court, Feb. 2, 2006). Here, as PALCO repeatedly
6 pointed out in the Regional Water Board proceedings, members of the Advisory Team have
7 served in a prosecutorial role in related matters directly involving PALCO.

8 "[T]he United States Supreme Court recognize[s] that arbitrary discrimination can arise
9 from ... the improper execution of [a] statute through duly constituted officials or agents."
10 Genesis Envtl. Serv. v. San Joaquin Valley Unified Air Pollution Control Dist., 113 Cal. App. 4th
11 597, 606 (2003) (citing Village of Willowbrook v. Olech, 528 U.S. 562, 564 (2000)). The
12 Issuance and Advisory Teams improperly executed the WDR statutes in plain violation of Water
13 Code Section 13360.

14 A fair trial in a fair tribunal is a basic requirement of due process.
15 This applies to administrative agencies which adjudicate as well as
16 to courts. Not only is a biased decisionmaker constitutionally
unacceptable but our system of law has always endeavored to
prevent even the probability of unfairness.

17 Withrow v. Larkin, 421 U.S. 35, 46-47 (1975). Here, the Issuance and Advisory Team revealed
18 that any perceived division between the members was illusory. They work together, they have
19 collaborated on PALCO matters in the past, and they have in many instances been proven wrong
20 on review. In these proceedings, "[t]he mental image comes to mind of a hearing in which county
21 counsel representing a county department raises an objection and then excuses himself from
22 counsel table to consult with the Board members as to whether the objection should be
23 sustained." Howitt v. Superior Court, 3 Cal. App. 4th 1575, 1582 (1992). "To allow an advocate
24 for one party to also act as counsel to the decisionmaker creates the substantial risk that the advice
25 given to the decisionmaker, 'perhaps unconsciously' ..., will be skewed." Id. at 1585.

26 Given the exclusive access that the Advisory Team had to the Regional Water Board,
27 PALCO has no way of knowing the influence that was exerted in developing the final WWDRs
28

1 that were adopted. PALCO only knows that its proposal was not accepted, and that new
2 burdensome requirements were adopted instead.

3 **VIII. LIST OF INTERESTED PARTIES³**

4 The Pacific Lumber Company
5 125 Main Street
6 P.O. Box 37
7 Scotia, California 95565
(707) 764-2222
(707) 764-4400 – fax
ccenter@palco.com

8 **IX. STATEMENT THAT COPIES OF THIS PETITION HAVE BEEN SENT TO**
9 **THE REGIONAL WATER BOARD**

10 Copies of this petition have been served on the North Coast Regional Water Quality
11 Control Board. Also, please see the attached Proof of Service.

12 **X. STATEMENT THAT ISSUES RAISED IN THIS PETITION WERE**
13 **PRESENTED TO THE REGIONAL WATER BOARD PRIOR TO**
14 **REGIONAL BOARD ACTION**

15 The issues raised in this Petition were presented to the North Coast Regional Water
16 Quality Control Board before adoption of the WWDRs.

17 **XI. REQUEST FOR HEARING**

18 PALCO is not requesting an immediate hearing in this matter, but reserves the right to do
19 so as implementation of the WWDRs progresses.

20 **XII. STATEMENT OF ADDITIONAL EVIDENCE**

21 PALCO reserves the right to present at the hearing on its Petition additional evidence that
22 includes, but is not limited to, the following:

- 23 • The improving conditions in the Elk River and Freshwater Creek watersheds
- 24 • Rebuttal evidence to the flawed findings contained in the WWDRs
- 25 • The economic and other impacts to PALCO and the regional economy from the
26 WWDR preparation and implementation

27 ³ Also, please see the attached Proof of Service representing designated parties to the
28 Regional Water Board proceedings.

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- Evidence with respect to communications between the Issuance and Advisory Teams

Dated: June 7, 2006

MORRISON & FOERSTER LLP

By: 
CHRISTOPHER J. CARR

Attorneys for Petitioners
THE PACIFIC LUMBER COMPANY,
SCOTIA PACIFIC COMPANY LLC
AND SALMON CREEK
CORPORATION

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CERTIFICATE OF SERVICE

I declare that I am employed with the law firm of Morrison & Foerster LLP, whose address is 425 Market Street, San Francisco, California 94105-2482. I am not a party to the within cause, and I am over the age of eighteen years.

I further declare that on June 7, 2006, I served a copy of:

**PETITION FOR REVIEW OF WATERSHED-WIDE WASTE
DISCHARGE REQUIREMENTS**

by placing a true copy thereof in separate, sealed envelopes addressed as follows:

SEE ATTACHED SERVICE LIST

- ☒ **BY U.S. MAIL** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, addressed as follows, for collection and mailing at Morrison & Foerster LLP, 425 Market Street, San Francisco, California 94105-2482 in accordance with Morrison & Foerster LLP's ordinary business practices. I am readily familiar with Morrison & Foerster LLP's practice for collection and processing of correspondence for mailing with the United States Postal Service, and know that in the ordinary course of Morrison & Foerster LLP's business practice the document(s) described above will be deposited with the United States Postal Service on the same date that it (they) is (are) placed at Morrison & Foerster LLP with postage thereon fully prepaid for collection and mailing.
- ☐ **BY FACSIMILE** by sending a true copy from Morrison & Foerster LLP's facsimile transmission telephone number 415.268.7522 to the fax number(s) set forth below, or as stated on the attached service list. The transmission was reported as complete and without error. The transmission report was properly issued by the transmitting facsimile machine. I am readily familiar with Morrison & Foerster LLP's practice for sending facsimile transmissions, and know that in the ordinary course of Morrison & Foerster LLP's business practice the document(s) described above will be transmitted by facsimile on the same date that it (they) is (are) placed at Morrison & Foerster LLP for transmission.
- ☐ **BY OVERNIGHT DELIVERY** by placing a true copy thereof enclosed in a sealed envelope with delivery fees provided for, addressed as follows, for collection by UPS, at 425 Market Street, San Francisco, California 94105-2482 in accordance with Morrison & Foerster LLP's ordinary business practices. I am readily familiar with Morrison & Foerster LLP's practice for collection and processing of correspondence for overnight delivery and know that in the ordinary course of Morrison & Foerster LLP's business practice the document(s) described above will be deposited in a box or other facility regularly maintained by UPS or delivered to an authorized courier or driver authorized by UPS to receive documents on the same date that it (they) is (are) placed at Morrison & Foerster LLP for collection.
- ☐ **BY ELECTRONIC SERVICE** by electronically mailing a true and correct copy through Morrison & Foerster LLP's electronic mail system to the e-mail address(s) set forth below, or as stated on the attached service list per agreement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this document was executed at San Francisco, California on June 7, 2006.

Catherine L. Berté
(typed)


(signature)

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